

CASE NO.: HSI920030207US1  
Serial No.: 10/670,948  
June 29, 2005  
Page 2

PATENT  
Filed: September 25, 2003

2. Contrary to the rejection of Claim 2, the relied-upon joints 1200 do not include a piezoelectric structure. The relied-upon piezoelectric motor in col. 12, lines 42-60 may be coupled to the joints 1200 shown in figure 16, but it has nothing to do with roll. Rather, it moves the slider linearly relative to a slot in a microactuator 1620, *id.*, evidently to make small *linear* position adjustments to the slider, col. 12, lines 61-63. Regardless, nothing in the description of the relied-upon piezoelectric motor mentions roll, much less establishing a RSA.

3. Contrary to the rejections of Claims 3 and 4, the HDD controller has nothing to do with the relied-upon joints 1200, much less controlling them to establish an RSA. The stiffness imparted by the joints 1200 is owing to their geometry, see above, independent of any signal the controller might generate. To the extent that the examiner believes the controller controls the piezoelectric motor, it does so only to move the slider translationally, into and out of the slot of the microactuator, not to do anything about RSA.

4. Contrary to the rejection of Claim 5, neither the piezoelectric motor nor the joints 1200 establish RSA, much less during unload/load. Indeed, the section of the reference relied on for this rejection, col. 7, lines 35-42, expressly teach that the ramp itself causes tilt. Col. 9, lines 62-65 has also been relied on, but all this section teaches is that motion limiters 510-515 limit motion - not that they have anything to do with RSA. Furthermore, the motion limiters 510-515 do not appear to be related to any of the structures in the reference that have been relied on as the RSA biasing mechanism in the rejections of preceding claims, so their invocation to reject Claim 5 is puzzling.

5. The rejection of Claim 6 is incoherent, confusing inherency with level of skill in the art, pointing to a figure and then to a section of the reference that has nothing to do with the pointed-to figure,

1182-KAM1

CASE NO.: HSI920030207US1

Serial No.: 10/670,948

June 29, 2005

Page 3

PATENT

Filed: September 25, 2003

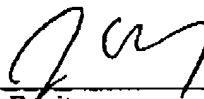
and alleging something about reciprocal torquing to arrive at claim limitations that are foreign to any logical relation to the relied-upon sections of the reference.

The other claims sets have not been specifically treated but have been elided over as having limitations "similar limitations to those treated above". Accordingly, Applicant need offer anything more specific than stating that the remaining claims are patentable.

The allegation about "HDD" not being defined appears to be incorrect. HDD is a well-known acronym that refers to generic hard disk drives and clearly is used as such in the application, see, e.g., the first sentence of the background and the preamble of Claim 7.

The Examiner is cordially invited to telephone the undersigned at (619) 338-8075 for any reason which would advance the instant application to allowance.

Respectfully submitted,



John L. Rogitz  
Registration No. 33,549  
Attorney of Record  
750 B Street, Suite 3120  
San Diego, CA 92101  
Telephone: (619) 338-8075

JLR:jg

1189-16.AM1